

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

QINGHUA XIE,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 07 C 7107
)	
ABBOTT LABORATORIES, an Illinois)	Judge Kendall
corporation,)	Magistrate Judge Nolan
)	
Defendant.)	

**JOINT MOTION TO STRIKE DEADLINES AND
SCHEDULE A SETTLEMENT CONFERENCE**

Defendant, Abbott Laboratories ("Abbott"), and Plaintiff Qinghua Xie ("Xie," and together with Abbott, the "Parties"), by and through their respective undersigned counsel, hereby jointly move this Court to strike the deadlines and dates set forth in this Court's February 25, 2008 Order and schedule a settlement conference. In support thereof, the Parties state as follows:

1. On February 25, 2008, after a status hearing, this Court set the following deadlines: Fact discovery closed July 25, 2008; Dispositive motions due August 25, 2008; Responses to dispositive motions due September 25, 2008; and Replies to dispositive motions due October 9, 2008. This Court also set a trial date for January 20, 2009, and a status hearing for July 28, 2008.

2. Since the February 25, 2008 status hearing, the Parties have diligently engaged in the discovery process by exchanging written discovery requests and responses and by taking the deposition of Xie.

3. At this point, the Parties would like to actively pursue the possibility of a negotiated settlement. Accordingly, the Parties request that this Court refer this case to Magistrate Judge Nolan for the purpose of scheduling a settlement conference. In furtherance of the settlement negotiation process, the Parties also request that this Court strike the deadlines and dates set forth in this Court's February 25, 2008 Order and re-set those deadlines, if necessary, after the Parties have engaged in a settlement conference before Magistrate Judge Nolan.

WHEREFORE, Defendant Abbott Laboratories and Plaintiff Qinghua Xie jointly and respectfully request that this Court: (1) refer this case to Magistrate Judge Nolan for the purpose of scheduling a settlement conference; and (2) strike the deadlines and dates set forth in this Court's February 25, 2008 Order.

Dated: July 14, 2008

Respectfully submitted,

ABBOTT LABORATORIES

QINGHUA XIE

By /s/ Matthew K. Organ
One of Its Attorneys

By /s/ Paul W. Ryan
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